United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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July 18, 2005

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Expires: 9/30/06

To: Field Managers

From: State Director

Subject: 2005 Montana/Dakotas Special Status Plant Species Policy

Purpose: The Special Status Species Policy 6840 gives the State Director the responsibility of designating Bureau of Land Management (BLM) sensitive species, and periodically reviewing/updating the list in cooperation with states and Natural Heritage Programs (NHPs). The sensitive species designation is used to provide conservation actions for species to preclude the need for listing and to improve the status of species to the point where special status recognition is no longer warranted. Sensitive species are afforded the same protection as that provided for federal candidate species.

This Instruction Memorandum (IM) transmits a procedure for establishing BLM sensitive plant species in Montana, North Dakota, and South Dakota and a list of BLM sensitive plants as developed by this procedure (Attachment 1).

Policy: The Montana/Dakota BLM sensitive plant list will be developed from species tracked by the NHPs in Montana, North Dakota, and South Dakota and from internal and external nominations. This approach is similar to the process used by the BLM in most states and the United States Forest Service Region 1. Coordination with the State Heritage Programs is directed in the 6840 Manual for management of special status species.

Species will be recommended to the State Director for designation as sensitive that are:

➤ Known to occur on BLM-administered land for which the BLM has the capability to significantly affect the conservation status of the species through management, or known to occur on lands affected by BLM-authorized actions;

And are either,

Tracked by one of the NHPs with a state rank of S1-S2 or a global rank of G1-G3 (see definitions of ranks in Attachment 2),

Or

The species is at risk due to one of the following seven criteria (from the 6840 Manual):

1. Could become endangered in or extirpated from the state, or within a significant portion of its distribution in the foreseeable future;

- 2. Are under status review by the United States Fish and Wildlife Service (USFWS) and/or the National Oceanic and Atmospheric Administration, Fisheries (NOAA, Fish);
- 3. Are undergoing significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution;
- 4. Are undergoing significant current or predicted downward trends in population or density such that federally-listed, proposed candidate, or state-listed status may become necessary;
- 5. Have typically small and widely dispersed populations;
- 6. Are inhabiting ecological refugia, specialized or unique habitats; or
- 7. Are state-listed but which may be better conserved through application of BLM sensitive species status. Such species should be managed to the level of protection required by state laws or under the BLM policy for candidate species, whichever would provide better opportunity for its conservation. (This only applies to South Dakota because Montana and North Dakota do not maintain lists of threatened or endangered plants.)

Collectively, the term "special status species" includes: species proposed for federal listing as threatened or endangered; species listed as threatened or endangered; species designated as candidates for listing; state-listed species; and BLM-sensitive species.

Action: The needs of sensitive plant species should be incorporated during budget planning, project planning, NEPA analysis, and land use planning. Field offices are responsible for special status species which are known or become known to occur in that field office.

- 1. Budget planning: Develop projects to gather new baseline information, improve or restore habitat, or monitor the condition of habitat and populations after treatments. Incorporate baseline information, habitat restoration, or sensitive plant monitoring into projects proposed for other resources. (Example, habitat improvement for sensitive plants from fuels treatment projects.) Linking project feasibility and benefits to sensitive species can improve the chance for funding.
- 2. NEPA analysis and compliance: When a project is proposed, the interdisciplinary team should look at the sensitive species list, Natural Heritage Database information, or other information as appropriate to see if sites or habitat of sensitive species are known to occur in the field office. If a proposed alternative or project has the potential to positively or negatively affect a sensitive species, the impacts should be described and addressed in the NEPA analysis. Mitigation measures should be developed to prevent excessive loss of known sites. If sites or habitat may be present, a field inventory should be conducted prior to project implementation at the optimum time of year to determine presence or absence of sensitive species.
- 3. Land Use Planning: During plan revision, the sensitive species list and the USFWS list should be used to define the decisions listed in Appendix C of the Land Use Planning Handbook (H-1601-1), primarily priority species and habitats and desired future conditions for populations and habitats.

Offices are encouraged to maintain a field office level watch list of rare plant species suspected to occur, either because the species occurs on adjoining land or likely habitat occurs in the field office. Watch species may also include state rank S3 species or global rank G4 where additional information may clarify conservation status of the species.

The Montana State Office (MSO) Botanist is available to assist the FOs with budget planning, NEPA, and land-use planning.

The sensitive species list will be updated periodically to reflect increased knowledge of known sites on BLM-administered land and changes in status at the NHPs. Species which are upgraded to S2 or above or G3 or above may be added to the sensitive list at that time. Species will be dropped from the state sensitive list when they no longer meet one of the seven criteria or which fall to state rank S3 or below or global rank G4 or below. Field offices may elect to continue to maintain the species on the field office watch list. Federally de-listed species will be designated as Bureau sensitive for 5 years for post-listing monitoring.

Taxonomic changes and species codes will follow the nomenclature in the USDA Plants Database, http://www.plants.usda.gov/.

Background: The sensitive plant species list has not been reviewed since it was completed in 1996 and the rationale for including various species has not been consistently documented. The previous Montana/Dakotas procedure to establish the sensitive plant species list is not consistent with the procedures in neighboring BLM states and FS regions. In order to have coordinated management of rare plants across jurisdictional boundaries, the policy for the BLM in Montana and the Dakotas needs to be updated. This will also clarify, for the public as well as BLM personnel, how and why species are on the sensitive plant list.

Contact: Please contact Nora Taylor (406) 896-5032 at the MSO with any questions or comments.

Signed by: Arthur J. Meredith, Acting

Authenticated by: Merry Prestridge (MT923)

- 2 Attachments
 - 1-Montana/Dakotas BLM Sensitive Plant Species List (9 pages)
 - 2-Definitions of Heritage ranks (1 page)

Distribution

SOMT - 1

Asst. FM Havre - 1

Asst. FM Glasgow - 1

Scientific Name	Species Code	Common Name	Global Rank	State Rank 2003 MNHP	State Rank 2002 SDNHP	State Rank 2004 NDNHP	010 - Billings	020 - Miles City	030 - N Dakota	040 - S Dakota	050 - Dillon	060 - Lewistown	070 - Butte	090 - Malta	092 - Glasgow	093 - Havre	100 - Missoula
Adoxa moschatellina	ADMO	musk-root	G5	S2	S3								K				
Agastache cusickii	AGCU	Cusick's horse- mint	G3G4	S1							K						
Ageratina occidentalis = Eupatorium occidentale	AGOC2	Western boneset	G4	S2							K						
Amaranthus californicus	AMCA	California amaranth	G4	S2							K						
Amerorchis rotundifolia = Orchis rotundifolia	AMRO	round-leaved orchis	G5	S2S3								K					
Amorpha canescens	AMCA6	leadplant	G5	SH				K									
Anagallis minima = Centunculus minimus	ANMI4	chaffweed	G5	S2										K			
Aquilegia formosa	AQFO	Sitka columbine	G5T4	S1							K		S				
Arabis demissa var. languida	ARDEL	Daggett rock cress	G5	S1			K										
Arabis fecunda	ARFE6	sapphire rockcress	G2	S2							K		K				
Asclepias stenophylla	ASST	narrowleaf milkweed	G4G5	S1				K									

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Astragalus aretioides = Orophaca aretioides	ASAR3	Sweetwater milkvetch	G4	S2			K										
Astragalus barrii	ASBA	Barr's milkvetch	G3	S2S3	S3			K									
Astragalus ceramicus var. apus	ASCEA	painted milkvetch	G4T3	S1				S			K						
Astragalus convallarius var. convallarius = A. junciformis	ASCOC9	lesser rushy milkvetch	G5T5	S2							K		K				
Astragalus geyeri	ASGEG	Geyer's milkvetch	G4	S2			K					S					
Astragalus grayi	ASGR4	Gray's milkvetch	G4?	S2			K										
Astragalus oreganus	ASOR2	Wind River milkvetch	G4?	S1			K										
Astragalus scaphoides	ASSC4	Bitterroot milkvetch	G3	S2							K						
Astragalus terminalis	ASTE9	railhead milkvetch	G3	S2							K						
Balsamorhiza macrophylla	BAMA4	large-leafed balsamroot	G3G5	S1							K						
Braya humilis	BRHU	low northern - rockcress	G5	S1							K						
C. idahoa = C. parryana ssp. idahoa	CAID	Idaho sedge	G2	S2							K		K				

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Camissonia andina																	
= Oenothera andina	CAAN14	obscure evening- primrose	G4	S2			K										
Camissonia parvula = Oenothera parvula	CAPA39	small camissonia	G5	S1			K										
Carex crawei	CACR3	Crawe's sedge	G5	S2				K				S					
Cirsium longistylum Cleome lutea	CILO2 CLLU2	long-styled thistle	G2 G5	S2 S1			K K					K					
Cryptantha fendleri	CRFE3	yellow bee plant Fendler cat's-eye	G4	S2			K				K						
Cryptantha scoparia	CRSC2	miner's candle	G4?	S1			K										
Cyperus schweinitzii	CYSC3	Schweinitz' flatsedge	G5	S2				K									
Cypripedium parviflorum	CYPA19	small yellow lady's-slipper	G5	S2S3		S2S3	K					S	K				K
Dichanthelium oligosanthes var. scribnerianum	DIOLS	Scribner's panic grass	G5T5	S1				K									
Draba globosa = D. apiculata	DRGL6	beavertip draba	G3	S1							K						
Draba ventosa	DRVE	Wind River draba	G3	S1							K						
Elodea bifoliata = E. longivaginata	ELBI2	long sheath waterweed	G4G5	S2			S				S			K			

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Erigeron	EDAG	T 1 1 C 1	C4	0.1							17						
asperugineus	ERAS	Idaho fleabane	G4	S1							K		**				
Erigeron linearis	ERLI	linearleaf fleabane	G5	S1							K		K				
Erigeron ochroleucus var. ochroleucus = E. parryi	EROCO	buff fleabane	G5T5	S2							K						
Eriogonum																	
caespitosum	ERCA8	matted buckwheat	G5	S1							K						
Eriogonum soliceps		Railroad Canyon wild buckwheat	G2	S2							K						
Enicacana anish ani	ERVI14	Visher's buckwheat	G3	S1	S3	S2S3		K									
Eriogonum visheri					33	3233	**	V									\vdash
Grayia spinosa	GRSP	spiny hopsage	G5	S2			K										
Grindelia howellii	GRHO	Howell's gumweed	G3	S2S3													K
Heliomeris multiflora var. multiflora = Viguiera multiflora	HEMUM	showy golden eye	G4G5	S1							K						
Hutchinsia procumbens	HUPR	prostrate hutchensia	G5	S1							K		K				
Ipomopsis congesta ssp. crebrifolia	IPCOC	ballhead ipomopsis	G5T3T4	S2							K						
Kobresia simpliciuscula	KOSI2	simple bog sedge	G5	S2							K					ah ma ar	

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Kochia americana	KOAM	green molly	G5	S1							K						
Leptodactylon caespitosum	LECA	mat prickly phlox	G4	S2			K										
Lesquerella carinata var. languida	LECAL3	Idaho bladderpod	G3G4T1	S1													K
Lesquerella lesicii	LELE26	Pryor Mountain bladderpod	G1	S1			K										
Lesquerella pulchella	LEPU15	beautiful bladderpod	G2	S2							K						
Leymus flavescens = Elymus flavescens	LEFL4	sand wildrye	G4	S1							K						
Lomatium attenuatum	LOAT	taper-tip desert- parsley	G3	S2							K						
Lomatium nuttallii	LONU3	Nuttall desert- parsley	G3	S1	SH			K									
Lomatogonium rotatum	LORO	marsh felwort	G5	S1							K						
Malacothrix torreyi = M. sonchoides v. torreyi	MATO2	Torrey's desert dandelion	G4	S1			K										
Megalodonta beckii var. beckii = Bidens beckii	MEBEB	Beck's water marigold	G4G5T4	S2													K
Mentzelia montana	MEMO4	soft blazingstar	G4	SH							K						

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Mentzelia nuda	MENU	bractless mentzelia	G5	S1				K									
Mentzelia pumila	MEPU3	dwarf mentzelia	G4	S2		S1	K										
Mimulus nanus	MINA	dwarf purple monkeyflower	G4	S1									K				
Mimulus ringens	MIRI	square-stem monkeyflower	G5	S1								K					
Nama densum	NADE2	leafy nama	G5	S1			K										
Orogenia fusiformis	AMRO	tapered-root Indian potato	G5	S2							K						
Pedicularis crenulata	PECR	meadow lousewort	G4	S1							K						<u> </u>
Penstemon angustifolius	PEAN4	narrowleaf penstemon	G5	S2				K									
Penstemon lemhiensis	PELE8	Lemhi beardtongue	G3	S2							K		K				
Penstemon whippleanus	PEWH	Whipple's beardtongue	G5	S1							K						
Phacelia incana	PHIN9	hoary phacelia	G3G4	S2							K						ļ
Phlox andicola	PHAN4	plains phlox	G4	S2				K									
Physaria brassicoides	PHBR5	double bladderpod	G5	S2				K									
Physaria didymocarpa v. lanata	PHDIL	common twinpod	G5T2	S1				K									
Plagiobothrys leptocladus	PLLE	slender-branched popcorn flower	G4	S1				S			K	S					

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Poa arnowiae = P.		short-leaved															
curta	POAR21	bluegrass	G4	S1			K										
Potentilla plattensis	POPL	Platte cinquefoil	G4	S1			K										
Primula alcalina	PRAL6	alkali primrose	G2	S1							K						
Primula incana	PRIN	mealy primrose	G4G5	S2		S1S2					K						
Pseudostellaria jamesiana = Stellaria jamesiana	PSJA2	James stitchwort	G5	S1							K						
Psilocarphus brevissimus	PSBR	dwarf wooly-heads	G4	S2				K			11						
Puccinellia lemmonii	PULE	Lemmon's alkaligrass	G4	S1							K						
Pyrola picta	PYP12	white-veined wintergreen	G4G5		S2					K							
Pyrrocoma carthamoides var. subsquarrosa = Haplopappus carthamoides v.		Beartooth large-															
subsquarrosus	PYCAS2	goldenweed	G4G5T2T3	S2			K										
Quercus macrocarpa	QUMA	bur oak	G5	S1				K									
Rorippa calycina	ROCA	persistent-sepal yellow-cress	G3	S1			K	K									

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Schoenoplectus heterochaetus =																	
Scirpus heterochaetus	SCHE5	slender bulrush	G5	S1										K			
Scorpidium scorpioides	SCSC70	worm moss	G4G5	S2								NP					
Shoshonea pulvinata	SHPU	shoshonea	G2G3	S1			K					111					
Solidago velutina = S. sparsifolia	SOVE6	few-flowered goldenrod	G5?	S1	SU			K									
Sphaeralcea munroana	SPMU	white-stemmed globe-mallow	G4	S1							K						
Sphaeromeria argentea	SPAR2	silver chicken sage	G3G4	S2							K						
Stenogonum salsuginosum = Eriogonum salsuginosum	STSA3	smooth buckwheat	G4?	S1			K										
Stephanomeria spinosa = Lygodesmia spinosa	STSP6	thorn skeletonweed	G4	S1							K						
Sullivantia hapemanii var. hapemanii	SUHAH	Wyoming sullivantia	G3T3	S2			K										
Taraxacum eriophorum	TAER2	Rocky Mountain dandelion	G4	S2							K						S

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Thalictrum	THAT	-1	C.F.	G2							17						
alpinum	THAL	alpine meadowrue	G5	S2							K						
Thelypodium paniculatum	THPA6	Northwestern thelypody	G2	SH							K						
Thelypodium sagittatum ssp. sagittatum	THSAS	arrow thelypody	G4T4	S2							K						
Thlaspi parviflorum	THPA2	meadow pennycress	G3	S2							K						
Townsendia condensata	TOCO2	cushion townsendia	G4	S1S2							K						
Townsendia florifera	TOFL2	showy townsendia	G5	S1							K						
Trichophorum pumilum = Scirpus pumilis var. rollandii	TRPU18	small clubrush	G5	S1								NP					

Abbreviation Definition At high risk because of extremely limited and potentially declining population numbers and/or habitat, making it highly vulnerable to global extinction or G1/S1 extirpation in the state. At risk because of very limited and potentially declining population numbers and/or habitat, making it vulnerable to global extinction or extirpation in the G2/S2 state. Potentially at risk because of limited range, populations and/or habitat, even G3/S3 though it may be abundant in some areas. Apparently secure, though it may be quite rare in parts of its range, and/or G4/S4 suspected to be declining. G5/S5 Demonstrably secure, though it may be quite rare in parts of its range. GU/SU Possible at risk, but status is uncertain; more information is needed. GH/SH Historical, known only from records over 50 years ago; may be rediscovered. Combination ranks Indicates a range of uncertainty about the status of the species, e.g. G3G4. Rank of a subspecies or variety; appended to the global rank of the full species, Sub-rank e.g. G4T3. Distinctiveness of the taxon is questionable; appended to the global rank, e.g. Q G3Q. Denotes uncertainty; inexactness. **MNHP** Montana Natural Heritage Program **SDNHP** South Dakota Natural Heritage Program **NDNHP** North Dakota Natural Heritage Program K Known on public land, from MNHP records S Suspected on public land NP Known on non-public land